

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

SHEET METAL WORKERS LOCAL 265)	
WELFARE FUND, <i>et al.</i> ,)	
)	
Plaintiffs,)	CIVIL ACTION
)	
vs.)	NO. 13 C 5602
)	
ROBERT E. MANLEY, d/b/a ROBERT E.)	JUDGE ROBERT W. GETTLEMAN
MANLEY,)	
)	
Defendant.)	

MOTION FOR ENTRY OF DEFAULT AND JUDGMENT

NOW COME Plaintiffs, by their attorneys, and move for entry of judgment by default against Defendant, ROBERT E. MANLEY, d/b/a ROBERT E. MANLEY, in the total amount of \$39,973.43, plus Plaintiffs' court costs and reasonable attorneys' fees in the amount of \$1,271.25.

On August 23, 2013, the Summons and Complaint was served on the Defendant by tendering a copy of said documents to him personally at his residence (a copy of the Summons and Affidavit of Service is attached hereto). Therefore, Defendant's answer was due on September 13, 2013. As Defendant has failed to timely answer the Complaint, Plaintiffs respectfully request entry of default and judgment.

/s/ Catherine M. Chapman

CERTIFICATE OF SERVICE

The undersigned, an attorney of record, hereby certifies that she electronically filed the foregoing document (Motion) with the Clerk of Court using the CM/ECF system, and further certifies that I have mailed the above-referenced document by United States Mail to the following non-CM/ECF participant on or before the hour of 5:00 p.m. this 6th day of November 2013:

Mr. Robert E. Manley
803 Woodbrook Court
Shorewood, IL 60404

/s/ Catherine M. Chapman _____

Catherine M. Chapman
Attorney for Plaintiffs
BAUM SIGMAN AUERBACH & NEUMAN, LTD.
200 West Adams Street, Suite 2200
Chicago, IL 60606-5231
Bar No.: 6204026
Telephone: (312) 236-4316
Facsimile: (312) 236-0241
E-Mail: cchapman@baumsigman.com